



Pennsylvania Newspaper Publishers' Association

May 21, 1992

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FCC MAIL SECTION

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RECEIVED BY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Reference: CC Docket No. 92-90

Dear Ms. Searcy:

We would like to take this opportunity to comment on telemarketing regulations to implement the Telephone Consumer Protection Act of 1991. The Pennsylvania Newspaper Publishers' Association (PNPA) consists of 270 newspaper members, representing both daily and weekly newspapers throughout Pennsylvania. Several newspaper members of PNPA currently utilize telemarketing devices such as sequential dialers to solicit newspaper subscriptions.

Among the regulatory options you are considering implementing, we are primarily concerned with implementing a national database of telephone numbers off limits to calls. If the FCC were to implement a national database of telephone subscribers who do not wish to receive telephone solicitations, any newspaper would be prohibited from making even one phone call to determine interest in a newspaper subscription. We are concerned that this large national database, a large number of telephone subscribers may opt-out from telemarketing calls who might otherwise be very open to subscribing to a newspaper. We believe that telemarketing by newspapers may well be less objectionable to consumers than calls coming from other businesses because newspapers inform consumers about civic and economic events of concern to them.

Just as we oppose a national database of off-limit solicitation numbers, we also support a system which would allow individual newspaper companies to maintain their own do-not-call systems. Some of our members who use telemarketing have informed us that they already maintain their own do-not-call numbers for several reasons. First, telemarketing is time consuming and costly, and there is no need to call those individuals who have already notified the newspaper that they do not wish to be solicited. Second, calling such individuals would simply be bad for business. Because newspaper publishers and editors identify with their readers in their communities, they sincerely try to respond to the concerns of their readers whenever possible. Preserving our ability to maintain these do-not-call numbers will allow us to continue to respond to those in our communities who do not wish to receive newspaper solicitations.

We thank you for considering our views as you develop these telemarketing regulations. As you develop these and other

regulations concerning telecommunications, we hope that you will bear in mind the vital functions which newspapers continue to perform in our democracy, such as promoting literacy, covering civic and government activities, promoting a variety of viewpoints on important issues of the day through editorials and letters to the editor, and encouraging economic competitiveness.

Sincerely,

Stephanie M. Grubert

Stephanie Grubert, PNPA President

W. B. Northrop

William B. Northrop, Chairman
PNPA Government Affairs Committee

Timothy Williams

Timothy M. Williams, PNPA Executive Director

Larry Boyle

Louis Lawrence Boyle, PNPA General Counsel

cc: PNPA Executive Committee